REMARKS

Reconsideration of the pending application is respectfully requested on the basis of the following particulars.

1.   Information Disclosure Statement

An information disclosure statement is filed concurrently herewith which cites relevant prior art documents cited in the parallel Spanish application 200550087 in a search report published October 15, 2007, and not previously cited in the pending application.

2.   In the specification

The specification is amended by way of the addition of section headers in the written description and the removal of specific reference to the claims. Further, the abstract is amended to place it in a single paragraph format.

It is submitted that the amendment to the specification does not introduce new matter. Entry of the amendment to the specification is respectfully requested in the next Office communication.

3.   In the claims

Independent claim 1 is amended to clarify that the first and second bank note processing machines both subject all of the bank notes of a deposit to first and second checking operations, respectively. Support for this amendment is found throughout the specification, in particular in view of the various embodiments described in connection with Fig. 2. This amendment is considered to make explicit that which was implicit in claim 1 prior to this amendment.

Independent claim 20 is amended similarly to claim 1.

Claim 6 is amended to overcome the objection in the action with regard to "a check result."

Claims 12 and 13 are amended to overcome their rejection in the action. In particular, claim 12 is amended to recite "a future processing operation." Claim 13 is

amended to recite "a" range. Thus, claims 12 and 13 overcome the objection to these claims in the action.

While not objected to in the action, claim 22 was amended like claim 12 in that it recites similar language to claim 12 but in dependence from claim 20.

Claim 29 is amended with the subject matter of previously presented claim 20 so as to place this claim in allowable format in view of the prior indication that claim 29 recites allowable subject matter. Claim 30 remains dependent from claim 29. Allowance of claims 29 and 30 is respectfully requested in the next Office communication.

It is asserted that the amendment to the claims finds clear support in the specification. Entry of the amendment to the claims and removal of the objection to certain claims is respectfully requested in the next Office communication.

4.   Rejection of claims 1-28 under 35 U.S.C. § 103(a) as being obvious over U.S. patent application publication 2004/0225407 (*Kunz*) in view of U.S. patent 5,937,396 (*Konya*)

Reconsideration of this rejection is respectfully requested in view of the amendment to independent claims 1 and 20, from which the remaining claims depend, and the following observations on *Kunz* and *Konya* which demonstrate how the rejected claims are not obvious over *Kunz* and *Konya*.

It is submitted that the proposed combination of *Kunz* and *Konya* fails to disclose or suggest a system or method for processing bank notes of a deposit by both first and second bank note processing machines in which an evaluation of the data is made based on checking operations conducted performed by both the first and second processing machines on all of the bank notes of a deposit.

Contrary to that which is alleged in the action, *Kunz* does not disclose or suggest processing all of the bank notes of a deposit by both first and second bank note processing machines. Indeed, while it is clear that bank notes may be checked by two bank note checking devices, only defective bank notes checked and identified from a first bank note checking device are supplied to a second bank note checking

device (see [0027]). In other words, the second checking device only processes selected bank notes already checked by the first checking device, and does not process all of the bank notes of the deposit.

In addition, unlike in the pending claims, the data obtained in the system of *Kunz* from the first and second checking devices is not merged or combined for evaluation. Instead, *Kunz* merely proposes jointly displaying the data from the first and second checking operations that were identified as being false or defective bank notes from the second checking operation so an operator may be able to inspect the bank notes manually ([0036], [0044]).

From *Kunz*, the skilled person would recognize that the technical goal of *Kunz* is to simply recheck bank notes which have not already been checked clearly or identified as defective, in order to reduce the amount of bank notes to be eliminated. It is abundantly clear from the disclosure that successfully checked bank notes are no longer processed (see flowchart of Fig. 3), and this does not connote a combined evaluation of all of the bank notes by two checking devices.

The skilled person, therefore, would not understand from *Kunz* to process all of the bank notes of a deposit by both first and second bank note processing machines, and then evaluate the data obtained from both processing machines.

Turning to *Konya*, the rejection relies on this prior art document to show how it was known to provide an evaluation device to which data of both first and second checking operations is supplied to for performing an evaluation. It is submitted that the skilled person would in no manner understand from *Konya* to evaluate data from first and second checking operations of bank notes.

Konya describes a system for transferring currency electronically to an ATM machine, and does not describe a processing machine which executes any checking operations of bank notes. Instead, the ATMs of *Konya* are merely capable of transmitting information regarding transactions to a main computer (5:61-6:8). From this main computer, other ATMs are linked to the computer to retrieve the transferred currency (6:26-40); the relationship of these ATMs has nothing to do with two checking operations of the same deposit of bank notes.

It is submitted that in no instance in *Konya* is there any reference to bank notes undergoing checking operations by the described ATMs, and a subsequent evaluation of such checking operations. Thus, the skilled person would not understand from *Konya* the limitation of the pending claims which requires an evaluation of data from two checking operations of the same bank notes of a deposit.

From these observations, it is clear that the skilled person would not understand or be motivated to make the claimed system and method for processing deposits of bank notes of the pending claims from the combination of *Kunz* and *Konya*. Not only does the combination of *Kunz* and *Konya* fail to collectively disclose or suggest every limitation of the pending claims, the skilled person would be deterred by *Kunz* to process all of the bank notes of a deposit by two different processing machines and evaluate the data therefrom in view of its teachings to only process bank notes a second time if they failed to meet criteria of a first checking operation. Further, the skilled person would not understand the basic concept of checking bank notes from *Konya*, and would only learn about electronic transmissions and evaluations thereof.

Accordingly, withdrawal and allowance of the pending claims is respectfully requested.

5.   Conclusion

As a result of the amendment to the claims, and further in view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is respectfully requested that every pending claim in the present application be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the applicant's attorney, the examiner is invited to contact the undersigned at the numbers shown below.

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Respectfully submitted,

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